U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Harris-Thomas Industries Site - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: **POLREP #2**
Removal Initiation
Harris-Thomas Industries Site

Dayton, OH
Latitude: 39.7648035 Longitude: -84.1699015

To:
Sherry Fielding, U.S. EPA
Jason El-Zein, U.S. EPA
Sam Borries, U.S. EPA
Mark Durno, U.S. EPA
Victor Dvorak, U.S. EPA
Tracy Johnson, U.S. EPA
Rick Karl, U.S. EPA
Jeff Kelly, OPA
Carol Ropski, EPA 5
John Maritote, EPA 5
Darby Valincia, DOI
Luis Oviedo, ORC
Greg Dunsky, DOJ
Arlene Lilly, EPA
Kevin Clouse, Ohio EPA
Dave Combs, Ohio EPA
George Stroebel, Ohio EPA
Jim Mehl, Ohio EPA
Dale Farmer, Ohio EPA
Carson Cockayne, DFD
Andrew Steele, Dayton Fire Department
Distribution List, National Response Center
John Sherrard, Dynamac

From: Steven Renninger, On-Scene Coordinator
Date: 10/26/2012
Reporting Period: October 22 through 26, 2012

1. Introduction

1.1 Background

Site Number:	C5D3	**Contract Number:**	EP-S5-08-02
D.O. Number:	30281-105	**Action Memo Date:**	
Response Authority:	CERCLA	**Response Type:**	Time-Critical
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	10/23/2012	**Start Date:**	2/2/2012
Demob Date:		**Completion Date:**	

CERCLIS ID:	**RCRIS ID:**	
ERNS No.:	**State Notification:**	Ohio EPA notified
FPN#:	**Reimbursable Account #:**	

1.1.1 Incident Category
February 2012 -- At the request of the Dayton Fire Department and the Ohio EPA, U.S. EPA conducted an emergency response action at the abandoned Harris-Thomas Industries Site to stabilize a transformer spill.

October 2012 -- U.S. EPA mobilized to begin a time-critical removal action

1.1.2 Site Description
The Site was vacated in 2006 by Harris-Thomas Industries (HTI), which utilized the Site to manufacture steel parts for the automotive and other industries. The property was transferred to HTI by Harris Thomas Drop Forge Company (HTDFC) in 1998. Prior to that time, HTDFC held ownership to the parcels since at least 1960. The Site is occupied by seven separate, mostly one-story buildings (one composed of approximately eight additions) of various construction. The buildings encompass approximately 30,000 square feet of area, and are located on one parcel totaling approximately 2.5 acres. Historic records indicate that the Site has been occupied by varies operators, including an oil distributor (1898), metal foundries (early 1900s), boiler makers (early 1900s), painting contractors (1960s), a metal treating company (1970s) and metal forging companies (1920s to 2006).

On February 2, 2012, the Dayton Fire Department (DFD) and the Ohio Environmental Protection Agency (Ohio EPA) investigated a report of transformer oil leaking from the facility roof onto a City of Dayton right-of-way sidewalk along Harshman Street. Due to site trespassing and vandalism (from "scrappers"), transformer oil was released and spilled on the roof, building, and adjacent sidewalk. Ohio EPA and DFD conducted a site inspection within the facility and not only observed the oil which had been released from the vandalized transformers on the roof to the sidewalk, but also observed numerous abandoned 55-gallon drums, containers and pits containing unknown liquids. Ohio EPA requested emergency stabilization assistance from U.S. EPA. On February 2, 2012, OSC Steve Renninger initiated an emergency stabilization action.

On February 3, 2012, DFD, U.S. EPA OSC Steve Renninger, U.S. EPA's Superfund Technical Assessment and Response Team (START) and U.S. EPA's Emergency Rapid Response Services (ERRS) contractors mobilized to the site and conducted emergency stabilization activities to limit the impact of the transformer oil which had been released to the ground from the transformers on the roof. U.S. EPA observed 4 transformers in an unsecured, fenced-in cage on the northwestern corner of the Die Shop Building roof. The ERRS contractor bulked oil-contaminated roofing debris into drums and used absorbent pads and a shop-vac to collect the pools of oil on the roof. ERRS secured the transformer cage with a chain and lock and placed absorbent boom around the transformer cage, placed absorbent boom into the roof gutters and also on the ground where the transformer oil was flowing off the property.

In a letter dated February 3, 2012, Ohio EPA formally requested assistance from U.S. EPA to determine if the Site meets the criteria for a removal action.

On February 6, 2012, DFD requested assistance from U.S. EPA to evaluate the Site for an emergency removal action to remove the hazardous waste on Site.

On February 10 and March 7, 2012, U.S. EPA mobilized to the Site and conducted two site inspections of the facility and observed approximately 25 55-gallon drums and 25 containers (having a volume of 5-gallons or less) containing unknown liquids; 10 pits containing unknown liquids; four roof and three large outside (7 total) transformers (potentially containing polychlorinated biphenyls [PCBs]); compressed gas cylinders; and floor sweepings (similar to foundry sand) on the floors and walls throughout the property. During the inspections, the U.S. EPA documented bulging 55-gallon drums and containers containing flammable, corrosive and toxic hazardous waste. In addition, U.S. EPA documented floor sweepings and wall solids containing elevated heavy metal (chromium and lead) concentrations. Uncontrolled heavy metals-contaminated waste piles were located adjacent to storm-water drains and accumulated near perimeter fencing due to migration during rain events.

All electric utilities have been shut off to the Site. A fence extends around the property to prevent

access, but there are numerous breaches in the fence. There have been at least two reported incidents of breaking and entering and vandalism (from "scrappers") on the property since February 2012.

On March 19, 2012, DFD, Ohio EPA and the City of Dayton's Division of Environmental Management responded to another transformer oil release at the Site. Trespassers accessed the property and climbed onto the roof (for the second time) of the Die Shop Building. The transformer cage which had been secured by U.S. EPA on February 3, 2012, was cut and removed and one of the four remaining transformers was tipped over and stolen by "scrappers" to access the copper wiring inside the unit. The oil inside the transformer spilled onto the roof and subsequently off the roof, onto the ground and off-site onto the City of Dayton sidewalk right-of-way. A copy of the police report is included as part of the Administrative Record. Ohio EPA requested emergency assistance from U.S. EPA to stabilize the release.

On March 20, 2012, DFD, U.S. EPA, START and ERRS remobilized to the Site and observed that the fencing surrounding the transformers had been breached and that one of the transformers had been stolen and the oil within the transformer had been released onto the roof. ERRS spread absorbent onto the areas where oil was pooled or stained on the roof and the ground. In addition, ERRS replaced the absorbent boom which had been impacted by the release and added additional layers of the absorbent boom at the point where the release had exited the Site.

1.1.2.1 Location

The HTI Site is located at 1400 East 1st Street (an alternate address is 126 Harshman Street) and is situated in a mixed commercial, industrial and residential area of Dayton, Montgomery County, Ohio 45403. The geographical coordinates for the Site are 39° 45' 53.2938" North latitude and 84° 10' 11.643" West longitude. The Site is bordered to the north by East 1st Street, beyond which is a vacant lot, to the east by Schumacher Crane Rental and BBC Converters, to the south by East 2nd Street, beyond which are Service Master Clean/Angler Construction and Patented Printing, and to the west by Harshman Street, beyond which is First Street Recycling (Figure A-2). Commercial and industrial businesses are located within 500 feet of the Site, and the closest residences are located within 1,000 feet south of the Site.

1.1.2.2 Description of Threat

On February 2, 2012, the Dayton Fire Department and the Ohio EPA investigated a transformer spill at the abandoned Harris-Thomas Industries Site. Site trespassers had vandalized numerous electrical transformers on the building roof. Transformer oil had spilled on to the adjacent roof, building gutters, driveway, and adjacent sidewalk. Evidence of further transformer damage was documented with numerous utility poles cut and transformers removed. Numerous unknown drums and waste piles were noted in the abandoned site.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

On February 10 and March 7, 2012, OSC Renninger and U.S. EPA's START contractor performed a Site Assessment. Activities performed during the Site Assessment included:

- Documenting Site conditions;
- Using an INNOV-X X-Ray Fluorescence (XRF) metals analyzer;
- Collecting samples from containers, pits, floor sweepings and wall solids; and
- Submitting the samples for commercial laboratory analysis.

During the Site Assessment, approximately 25 55-gallon drums and 25 containers (having a volume of 5-gallons or less) containing unknown liquids, 10 pits containing unknown liquids, compressed gas cylinders and four transformers were documented abandoned on Site. Many of 55-gallon drums and containers contained labels such as "Muriatic Acid", "Lacquer Thinner" and "Hydraulic Oil." Numerous drums and containers were in poor condition and bulging. Commercial properties are located within 500 feet of the western and eastern perimeter of the Site. Residential properties are located within 1,000 feet south of the Site.

Field screening and pH testing of 55-gallon drums and containers indicated that many of the materials met the RCRA criteria for characteristic hazardous waste including ignitability and corrosivity. INNOV-X XRF heavy metal field screening of the floor sweepings and unknown solids piled on the walls of the buildings documented widespread heavy metals-contamination with total chromium concentrations as high as 21,617 parts per million (ppm) and total lead concentrations as high as 57,629 ppm.

A total of 34 XRF samples were collected and analyzed with the XRF unit throughout the property. The total lead results from the outside soil, floor sweepings and wall solids were compared to U.S. EPA's Regional Screening Levels (RSL) for the protection of groundwater. The U.S. EPA Superfund Program developed the RSLs as risk-based soil screening levels considered protective of groundwater that may be used to set initial cleanup criteria or help identify areas, contaminants, and conditions that require further federal attention. A total of 24 XRF samples from outside soil, floor sweepings or wall solids showed total lead concentrations ranging from 818 to 57,629 ppm, which exceeds the U.S. EPA lead RSL of 800 ppm (industrial properties). The XRF lead results for the floor sweepings and the wall solids were compared to the RSL due to numerous open bay doors leading to the environment and leaking roofs in each of the buildings. XRF results from waste piles located within 5-feet of a storm-water drain showed total lead concentrations as high as 1,035 ppm. The potential exists for rain to enter the various facility buildings and cause lead migration into the outside soil, storm-water sewer drains and the environment, which could then lead to groundwater contamination.

U.S. EPA collected the following samples during its Site Assessment: seven liquid samples from containers and pits; and 14 solids samples from the floor, wall and unknown solids outside of the building. The samples were submitted for commercial laboratory analysis. Analytical results from the Site Assessment documented that ignitable, corrosive and toxic (TCLP MEK) hazardous substances are present on Site. In addition, the Site Assessment documented elevated concentrations of total chromium and total lead are located in the floor sweepings and wall solids throughout the facility.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

On February 2, 2012, U.S. EPA issued an emergency response delivery order to U.S. EPA contractor Environmental Quality Management (EQM) to stabilize the transformer spill at the site.

In a letter dated February 3, 2012, Ohio EPA formally requested assistance from U.S. EPA to determine if the Site meets the criteria for a removal action.

In a letter dated February 6, 2012, DFD EPA formally requested assistance from U.S. EPA to determine if the Site meets the criteria for a removal action.

In an email dated March 24, 2012, the City of Dayton House Inspection Department's Nuisance Abatement program, formally requested assistance from U.S. EPA to evaluate the property for additional security measures to limit unauthorized access.

In a letter dated March 26, 2012, City of Dayton Division of Environmental Management formally requested assistance from U.S. EPA to determine if the Site meets the criteria for a time-critical removal action.

On April 23, 2012, the Director of U.S. EPA's Superfund Division approved an Action Memorandum approving funding for a time-critical removal action at the HTI Site.

On October 22, 2012, EPA and DOJ submitted an application for *ex parte* issuance of administrative warrant to gain access to the HTI Site. The application was submitted to U.S. Magistrate Judge Michael R. Merz (Case No. 3:12mc021).

On October 22, 2012, U.S. Magistrate Judge Merz signed the Warrant granting U.S. EPA access to the HTI Site for a time period of 120 days to conduct a time-critical removal action.

2.1.2 Response Actions to Date

Week of October 22, 2012

On October 22, 2012, the warrant for access was posted on the HTI building at 1500 hours. Site Emergency Contingency Plan finalized and distributed to DFD.

On October 23 and 24, 2012, the ERRS contractor mobilized office trailers, 50kW generator, equipment and personnel to the site to begin setting up for the time-critical removal action. Crew initiated set up of

the Support Zone.
Off-shift site security was initiated. All personnel reviewed and signed the approved H&S Plan. Eight "Danger - Do Not Enter - Hazardous Materials" signs were posted on the perimeter fence.

On October 24 and 25, 2012, U.S. EPA arranged for a crew from Dayton Power & Light to mobilize to the HTI Site and remove the following:

- Overhead power lines
- 3 wooden power poles
- 3 small transformers and 1 large transformer

On October 26, 2012, ERRS crew initiated collection and staging of drums and containers in Building E.

Site working hours are Monday through Friday, 8am to 5pm. Site security is on site during non-working hours.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)
U.S. EPA has completed a title search and PRP search. U.S. EPA has sent out 104(e) letters to past owners and operators at the Site.

2.1.4 Progress Metrics

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*
Transformers	Solid	3 small 1 large	None	Recycle	Dayton Power & Light Dayton, Ohio

2.2 Planning Section

2.2.1 Anticipated Activities
Removal activities on Site will include:

1. Develop and implement a Site-specific Health and Safety Plan, including an Air Monitoring Plan, and a Site Emergency Contingency Plan;
2. Develop and implement a Site Security Plan;
3. Secure Site with fence repair, boarding and/or locking windows and doors.
4. Inventory, sample, and perform hazard characterization, in compliance with a Site-specific QA/QC Plan, on all substances contained in drums, containers, pits, transformers and waste piles;
5. Consolidate and package all hazardous substances, pollutants and contaminants for transportation and off-site disposal;
6. Consolidate and package heavy metal-contaminated floor sweepings and wall solids for transportation and off-site disposal;
7. Transport and dispose of all characterized or identified hazardous substances, pollutants, wastes, or contaminants at a RCRA/CERCLA-approved disposal facility in accordance with U.S. EPA's Off-Site Rule (40 C.F.R. § 300.440).

2.2.1.1 Planned Response Activities
See above.

2.2.1.2 Next Steps
1. ERRS to stage drums and containers in Building E
2. Conduct extent of contamination survey in various buildings on Site.
3. Mobilize hazardous and non-hazardous rolloff boxes on site.
4. Mobilize a frac tank to stage contaminated wastewater.
5. Remove two large transformers on Tuesday, October 30, 2012.

6. Continue Site Security.

2.2.2 Issues
The Harris-Thomas is an abandoned industrial site with a history of trespassing and vandalism. Site contaminants include transformer oils, solvents, and heavy metals.

Site security is being conducted during non-working hours.

2.3 Logistics Section
Site Security during non-working hours continues.

Site gate is locked during non-working hours.

2.4 Finance Section

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	$605,000.00	$34,405.00	$570,595.00	94.31%
TAT/START	$20,000.00	$4,900.00	$15,100.00	75.50%
Intramural Costs				
USEPA - Direct	$20,000.00	$3,000.00	$17,000.00	85.00%
Total Site Costs	$645,000.00	$42,305.00	$602,695.00	93.44%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff
2.5.1 Safety Officer

Site HASP has been completed and signed by site personnel.

2.5.2 Liaison Officer

Not applicable.

2.5.3 Information Officer

Not applicable.

3. Participating Entities
3.1 Unified Command

Not applicable.

3.2 Cooperating Agencies

Dayton Fire Department
Ohio EPA

4. Personnel On Site

U.S. EPA
ERRS Contractor - Environmental Quality Management (EQM)
START Contractor - WESTON Solutions

5. Definition of Terms

Not applicable.

6. Additional sources of information

6.1 Internet location of additional information/report

Additional information can be obtained at the following Site website:

http://www.epaosc.org/site/site_profile.aspx?site_id=7586

6.2 Reporting Schedule

The next POLREP will be issued in November 2012.

7. Situational Reference Materials

Not applicable.

NOTICE

PRESENCE ON THESE PREMISES IS PROHIBITED

WITHOUT WRITTEN CONSENT FROM
THE CITY OF DAYTON, HOUSING INSPECTION DIVISION
371 W. SECOND STREET • (937) 333-3977

VIOLATORS, INCLUDING OWNERS, §308.1/152.121
SHALL BE PROSECUTED, R.C.G.O.